Exhibit A

Christopher Geddis

From: Conlee Whiteley < c.whiteley@kanner-law.com >

Sent: Tuesday, July 20, 2021 5:43 PM

To: Goldberg, Seth A. <<u>SAGoldberg@duanemorris.com</u>>; Lockard, Victoria D. (Shld-Atl-LT) <<u>lockardv@gtlaw.com</u>> **Cc:** Adam Slater <<u>ASlater@mazieslater.com</u>>; Ruben Honik <<u>ruben@honiklaw.com</u>>; Daniel Nigh <<u>dnigh@levinlaw.com</u>>

Subject: Valsartan Expert Depositions

EXTERNAL TO GT

Seth and Victoria:

We can confirm that, as with Dr. Hecht, Dr. Etminan has requested that his deposition be taken by Zoom/video conference and that plaintiffs' counsel do not intend to attend the deposition in person. The other three experts in this group have agreed to in-person depositions.

Thanks, Conlee

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